## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

INTERNATIONAL BUSINESS MACHINES CORPORATION,	)
Plaintiff,	) C.A. No. 22-590-GBW
v.	) JURY TRIAL DEMANDED
ZYNGA INC.,	)
Defendant	)

## PLAINTIFF IBM'S MOTION FOR ENHANCED DAMAGES

Plaintiff International Business Machines Corporation ("IBM"), by and through its undersigned counsel, respectfully moves this Court for an Order enhancing the jury's damages award. The grounds for IBM's Motion are set forth in its Opening Brief filed contemporaneously herewith.

## OF COUNSEL:

John M. Desmarais Karim Z. Oussayef Tamir Packin Raymond N. Habbaz Benjamin Rodd Caitrianne Feddeler Michael Hilyard DESMARAIS LLP 230 Park Avenue New York, NY 10169 Tel: (212) 351-3400

Tuhin Ganguly Sumeet Dang DESMARAIS LLP 1899 Pennsylvania Avenue NW, Suite 400 Washington, D.C. 20006 Tel: (202) 451-4900

Michael R. Rhodes DESMARAIS LLP 101 California Street San Francisco, CA 94111 Tel: (415) 573-1900

Dated: October 22, 2024 11839968 / 00311.00032

Respectfully submitted,

POTTER ANDERSON & CORROON LLP

By: /s/ David E. Moore

David E. Moore (#3983) Bindu A. Palapura (#5370) Andrew L. Brown (#6766) Hercules Plaza, 6<sup>th</sup> Floor 1313 N. Market Street Wilmington, DE 19801 Tel: (302) 984-6000

dmoore@potteranderson.com bpalapura@potteranderson.com abrown@potteranderson.com

Attorneys for Plaintiff International Business Machines Corporation